

# EXHIBIT B

## Hamill, Bridget (LAW)

---

**From:** David B. Rankin <DRankin@BLHNY.COM>  
**Sent:** Monday, May 9, 2022 1:10 PM  
**To:** Hamill, Bridget (LAW)  
**Cc:** Weng, Jenny (Law); Nelson, Genevieve (Law); Sow-Legal  
**Subject:** [EXTERNAL] Re: Sow - 2nd Set of Discovery Discovery Demands  
**Attachments:** 2 8 22 motion to court 386-main.pdf; City Rsp to Mo to Comp.pdf; Supplemental document demands.pdf; 457 - Sanctions Order on 431 and 439-1.pdf

You don't often get email from drankin@blhny.com. [Learn why this is important](#)

**CAUTION:** This email originated from outside of the organization. Do not click links or open attachments unless you recognize the sender and know the content is safe. Forward suspect email to [phish@cyber.nyc.gov](mailto:phish@cyber.nyc.gov) as an attachment (Click the More button, then forward as attachment).

Hi Bridget,

We do not believe this matter requires an additional meet and confer. We had a meet and confer on January 21, 2022, wherein your office agreed to answer these demands by February 4, 2022. This did not happen. On February 8, 2022, the undersigned wrote the Court to compel a response. On February 10, 2022, your office wrote the court stating that responses would be provided by February 24, 2022. Your office failed to preform both the agreements made with us and then represented to the Court. These communications are attached.

Additionally, your email suggests you are taking the same position the court rejected in Dkt. 457. Also attached. I wrote you last week, and your office in April to avoid going back to the court in the hope that we would get responses.

Again, we can still avoid additional motion practice if we get prompt responses, which is of course, the purpose of this writing. I have attached the supplemental demands. Given the transitions in your staffing, we would appreciate responses by COB Friday.

I note that the agreement reached with your office stated that if a demand was duplicative of other demands, we would receive a notation which indicated which demand it was believed to be duplicative of and a what documents were produced in response to those demands.

Given the unnecessary time and expense necessary to get responses, which were due almost six months ago, we reserve our right to seek fees associated with the presumably forthcoming application.

Best,  
David

-----  
**David B. Rankin (he/him) | Partner**  
**Beldock Levine & Hoffman LLP**  
99 Park Avenue, PH/26th Fl. | New York, NY 10016  
Tel: (212) 277-5825 Cell: (917) 455-0609  
[DRankin@blhny.com](mailto:DRankin@blhny.com) | <http://www.blhny.com>

---

**This message may contain privileged material. If you are not the intended recipient, please return it.**

---

**From:** Hamill, Bridget (LAW) <brhamill@law.nyc.gov>  
**Sent:** Friday, May 6, 2022 6:44 PM  
**To:** David B. Rankin <DRankin@BLHNY.COM>  
**Cc:** Weng, Jenny (Law) <jweng@law.nyc.gov>; Nelson, Genevieve (Law) <gnelson@law.nyc.gov>; Sow-Legal <Sow-Legal@blhny.com>  
**Subject:** RE: Sow - 2nd Set of Discovery Discovery Demands

David,

We thought we responded to at least the Supplemental Document Requests on the DRI Chart dated April 15, 2022. We can work on the other requests and are happy to meet and confer next week about any outstanding issues. Please provide a copy of the requests and dates and times you are available to meet.

Regards,  
Bridget Hamill

---

**From:** David B. Rankin <DRankin@BLHNY.COM>  
**Sent:** Thursday, May 5, 2022 9:02 PM  
**To:** Hamill, Bridget (LAW) <brhamill@law.nyc.gov>  
**Cc:** Weng, Jenny (Law) <jweng@law.nyc.gov>; Nelson, Genevieve (Law) <gnelson@law.nyc.gov>; Sow-Legal <Sow-Legal@blhny.com>  
**Subject:** [EXTERNAL] Re: Sow - 2nd Set of Discovery Discovery Demands

**CAUTION:** This email originated from outside of the organization. Do not click links or open attachments unless you recognize the sender and know the content is safe. Forward suspect email to [phish@cyber.nyc.gov](mailto:phish@cyber.nyc.gov) as an attachment (Click the More button, then forward as attachment).

Hi All,

Going to be bringing this matter before the court next week. Would love to not have to. Please update.

Best,  
David

-----  
**David B. Rankin (he/him) | Partner**  
**Beldock Levine & Hoffman LLP**  
99 Park Avenue, PH/26th Fl. | New York, NY 10016  
Tel: (212) 277-5825 Cell: (917) 455-0609  
[DRankin@blhny.com](mailto:DRankin@blhny.com) | <http://www.blhny.com>

---

**This message may contain privileged material. If you are not the intended recipient, please return it.**

---

**From:** David B. Rankin <[DRankin@BLHNY.COM](mailto:DRankin@BLHNY.COM)>  
**Sent:** Friday, April 15, 2022 1:26 PM

**To:** Weiss, Dara (Law) <[daweiss@law.nyc.gov](mailto:daweiss@law.nyc.gov)>  
**Cc:** Weng, Jenny (Law) <[jweng@law.nyc.gov](mailto:jweng@law.nyc.gov)>; Nelson, Genevieve (Law) <[gnelson@law.nyc.gov](mailto:gnelson@law.nyc.gov)>  
**Subject:** Re: Sow - 2nd Set of Discovery Discovery Demands

It's been so long I forgot what we called them! Yes, the supplemental discovery demands.  
Thanks,  
David

-----  
**David B. Rankin (he/him) | Partner**  
**Beldock Levine & Hoffman LLP**  
99 Park Avenue, PH/26th Fl. | New York, NY 10016  
Tel: (212) 277-5825 Cell: (917) 455-0609  
[DRankin@blhny.com](mailto:DRankin@blhny.com) | <http://www.blhny.com>

---

**This message may contain privileged material. If you are not the intended recipient, please return it.**

---

**From:** Weiss, Dara (Law) <[daweiss@law.nyc.gov](mailto:daweiss@law.nyc.gov)>  
**Sent:** Friday, April 15, 2022 1:22 PM  
**To:** David B. Rankin <[DRankin@BLHNY.COM](mailto:DRankin@BLHNY.COM)>  
**Cc:** Weng, Jenny (Law) <[jweng@law.nyc.gov](mailto:jweng@law.nyc.gov)>; Nelson, Genevieve (Law) <[gnelson@law.nyc.gov](mailto:gnelson@law.nyc.gov)>  
**Subject:** Re: Sow - 2nd Set of Discovery Discovery Demands

Hi David,  
Can you please send us the demand you are referring to? We have a "supplemental demand" but not sure if that's the "2<sup>nd</sup> set" you are referring to  
Thanks,  
Dara

---

Dara L. Weiss  
Senior Counsel  
New York City Law Department  
Special Federal Litigation  
100 Church Street  
New York, New York 10007  
(212) 356-3517 (phone)  
(212) 356-3509 (fax)  
[Daweiss@law.nyc.gov](mailto:Daweiss@law.nyc.gov)

---

**From:** David B. Rankin <[DRankin@BLHNY.COM](mailto:DRankin@BLHNY.COM)>  
**Sent:** Friday, April 15, 2022 11:31 AM  
**To:** Weiss, Dara (Law) <[daweiss@law.nyc.gov](mailto:daweiss@law.nyc.gov)>  
**Subject:** [EXTERNAL] Sow - 2nd Set of Discovery Discovery Demands

**CAUTION:** This email originated from outside of the organization. Do not click links or open attachments unless you recognize the sender and know the content is safe. Forward suspect email to [phish@cyber.nyc.gov](mailto:phish@cyber.nyc.gov) as an attachment (Click the More button, then forward as attachment).

Hi Dara,

Where are we at with responses to Sow's second set of discovery demands? I have been assuming they are coming with your next batch of production - or do you understand something else?

Best,  
David

-----  
**David B. Rankin (he/him) | Partner**  
**Beldock Levine & Hoffman LLP**  
99 Park Avenue, PH/26th Fl. | New York, NY 10016  
Tel: (212) 277-5825 Cell: (917) 455-0609  
[DRankin@blhny.com](mailto:DRankin@blhny.com) | <http://www.blhny.com>

---

**This message may contain privileged material. If you are not the intended recipient, please return it.**